ALABAMA HAZARDOUS WASTES MANAGEMENT AND MINIMIZATION ACT (AHWMMA)

Compliance Evaluation Inspection (CEI) Report

1) Author of Report

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Compliance and Enforcement, Industrial Hazardous Waste Branch
Alabama Department of Environmental Management (ADEM)
1400 Coliseum Boulevard
Montgomery, AL 36110

2) Facility Information

Sanmina Corporation (Sanmina)
13000 S. Memorial Parkway
Huntsville, (Madison County), Alabama 35803

EPA ID Number: ALD983166257
NAICS Code(s): 334418, 334419

3) Responsible Official(s)

Mr. Gregory Bryant – Environmental Health and Safety Engineer
Telephone: 256-882-4764
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4) Inspection Participant(s)

Mr. Greg Bryant – Sanmina
Mr. Keith Bush - Sanmina
Ms. Bailee Dykes – ADEM

5) Date of Inspection

July 28, 2016

6) Applicable Regulations

ADEM Administrative Code Division 335-14, Hazardous Waste Program Regulations

7) Purpose of Inspection

The purpose of this inspection was to determine compliance with all applicable requirements of the

Hazardous Waste Program regulations.

8) Facility History & Description

Sanmina is a manufacturer of communications and infrastructure, defense, and aerospace equipment. Industrial and semiconductor systems, medical, enterprise computing and storage solutions data are all aspects of the inter-workings of Sanmina. Sanmina also conducts business in multimedia, automotive and technology sectors. The Huntsville location assembles circuit boards and electronic components for blood glucose monitors, blood pressure monitors, missiles, helicopters, etc. The Huntsville location has been in operation since 1984 and employees roughly 1500 people; six of whom have assigned jobs related to hazardous waste management. The facility consists of two plants: Plant 437 (Defense/Aerospace (Governmental Side)) and Plant 438 (Medical Division). The hours of operation for Plant 437 are 6:00 am to 3:30 pm, Monday through Friday, and Plant 438 operates 24 hours a day, seven days a week, 365 days a year. The combined plants consist of approximately 680,000 square feet. The facility last submitted a *Notification of Regulated Waste Activity* form (ADEM Form 8700-12, received by the Department on April 12, 2016) identifying itself as a large quantity generator of hazardous waste and a small quantity handler of universal waste.

9) Observations

I arrived at the facility at approximately 8:15 am and was greeted by Mr. Bryant. During the opening conference, I identified myself and explained the purpose of the inspection. According to Mr. Bryant, the facility generates the following hazardous wastes: conformal and parylene coating of paint on the governmental side, thinners, and corrosive waste (stripping of coating on circuit boards). The facility also generates universal waste (light bulbs, compact fluorescents, tube fluorescents, and batteries). Hazardous waste codes (D001, D002, F003, F005, and D035) are transported by Tradebe Transportation, LLC (INR000123497) to Tradebe Treatment & Recycling of Tennessee (TND000772186) for storage/treatment. During the opening conference, Mr. Bryant provided me with the following documents required by Division 14 of the ADEM Administrative Code:

- Hazardous waste shipping manifests for the last three years
- Weekly inspection logs of hazardous waste storage areas
- Training records of employees who manage hazardous waste
- Contingency Plan
- Documentation of arrangements with local emergency responders
- Waste Minimization Plan

After a review of the documents, the following area of concern was noted:

- The Contingency Plan did not have a designated emergency coordinator listed.

Following the opening conference and document review, Mr. Bryant guided me on a walk-through inspection of the facility, noting the following areas:

Plant 438 (Medical Side)

First, Mr. Bryant escorted me to Plant 438, which consists of the medical side of Sanmina. In this plant, there are several production lines for making circuit boards. According to Mr. Bryant, excess flux generated in this area is recycled. Mr. Bryant stated that the main hazardous waste generated here is aerosol cans (e.g. dust spray cleaner) used to clean the machines. The product in the aerosol cans are used completely, then the empty aerosol cans are punctured and placed on a shelf in the plant prior to being disposed. No areas of concern were noted in Plant 438 at the time of the inspection.

90-day Hazardous Waste Storage Area

Next, Mr. Bryant escorted me to the 90-day hazardous waste storage area. The entrance to the hazardous waste storage area was locked/secured and had signage bearing the words "Entrance Into Hazardous Waste Storage Area Must be kept clear at all times". In this area, I observed nine 55-gallon drums and two 30-gallon drums of hazardous waste. Seven of the nine 55-gallon drums were labeled with the words "Hazardous Waste"; marked with "7/27/16", "7/19/16", "6/28/16", "5/23/16", "6/20/16", "6/13/16", and "6/02/16" for accumulation start dates; closed; and all contained "D001, D035, F003, F005" hazardous waste. One 55-gallon drum was labeled with the words "Hazardous Waste", "Corrosive"; marked with "6/20/16" for an accumulation start date; closed; and contained a "D002" hazardous waste. One 55-gallon drum was labeled with the words "Hazardous Waste", "Corrosive", "Flammable"; marked with "7/27/16" for an accumulation start date; closed; and contained "D001 and D002" hazardous waste. The two 30-gallon drums were labeled with the words "Hazardous Waste" "Corrosive"; marked with "6/23/16" and "6/28/16" for accumulation start dates; and both were marked as "D002" hazardous waste. In this area, I also observed two 5-gallon containers of universal waste. One container was labeled with the words "Universal Waste – Spent Alkaline Batteries", and the other container was labeled with the words "Universal Waste – Spent Lithium Ion Batteries". Both containers were closed and marked with "7/15/16" for the accumulation start date. The 90-day hazardous waste storage area was equipped with a proper secondary containment system. No areas of concern were noted in this area at the time of the inspection.

Plant 437 (Defense/Aerospace (Governmental Side))

Next, Mr. Bryant escorted me to Plant 437, which consists of the governmental contract side of Sanmina. Mr. Bryant escorted me to the coating operations area where the hazardous waste is generated in the plant. Two coating operations: parylene coating and conformal coating are applied to circuit boards in this area. Hazardous waste that is generated in this area is transferred into 5-gallon containers that are kept in a yellow fireproof metal cabinet. According to Mr. Keith Bush, Chemical Control Technician at Sanmina, the laboratory for space to work is restricted. Due to space restrictions, the 5-gallon containers are taken and emptied daily to the satellite accumulation point storage area for the laboratory. Mr. Bush also stated that some days the coating operations lab may not perform any painting and that it is all demand driven.

Satellite Accumulation Point Storage

Last, Mr. Bryant and Mr. Bush escorted me to a metal building that is located at the rear of the facility utilized for satellite accumulation. The entrance to the building was locked and had signage bearing the words "Caution – Hazardous Waste Satellite Accumulation Point – Unauthorized Personnel Keep Out" and "No Smoking". In this area, I observed four 55-gallon drums and one 5-gallon container of hazardous waste. Two of the 55-gallon drums were labeled with the words "Hazardous Waste", closed, marked with "7/25/16" and "7/27/16" for accumulation start dates, and contained "D001, D035, F003, and F005" hazardous waste. One 55-gallon drum was labeled with the words "Hazardous Waste – Araldrite/Aradur Mixture", closed, marked with "6/28/16" for an accumulation start date, and contained a "D002" hazardous waste. One 55-gallon drum was labeled with the words "Hazardous Waste – Corrosive Waste", closed, marked with "7/27/16" for an accumulation start date, and contained "D001 and D002" hazardous waste. One 5-gallon container was labeled with the words "Hazardous Waste – RTV 608", closed, and marked with "12/16/15" for an accumulation start date.

Mr. Bush stated that as part of their management procedures, an accumulation start date is marked on each drum as well as kept in a log book in the coating operations laboratory. When a drum is full, a finish date is marked on the drum as well, record in the log book, then a new hazardous waste label is placed on the drum with the accumulation start date of when the drum is full and transferred to the 90-day storage area. Weekly inspections are also conducted for the satellite accumulation point storage area.

Summary

This inspection was performed to determine the facility's compliance with all applicable requirements of Division 14 of the ADEM Administrative Code. During the inspection, the following area of noncompliance was noted:

- The facility's Contingency Plan did not have anyone designated as the emergency coordinator.

Following the walk-through inspection, I discussed my observation with Mr. Bryant. At the conclusion of the closing conference, I prepared a *Noncompliance Warning*, indicating the area of noncompliance noted during the time of inspection. Mr. Bryant reviewed, signed, and accepted the report on behalf of Sanmina. I concluded the closing conference and departed the site at approximately 11:15 am.

10) Signed

Compliance and Enforcement Section
Industrial Hazardous Waste Branch
Land Division

8/4/2016
Date

11) Concurrence

Clethes Stallworth, Chief
Compliance and Enforcement Section
Industrial Hazardous Waste Branch
Land Division

8/4/2016
Date